

**KLESTADT WINTERS JURELLER  
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*Proposed Counsel to the Debtor and Debtor in  
Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11  
:   
HBL SNF, LLC, d/b/a EPIC REHABILITATION : (Subchapter V)  
AND NURSING AT WHITE PLAINS, :   
: Case No. 21-22623 (SHL)  
Debtor. :   
-----X

**NOTICE OF FILING OF PROPOSED CONSENT ORDER DIRECTING THE  
APPOINTMENT OF A PATIENT CARE OMBUDSMAN PURSUANT TO 11 U.S.C. § 333**

**PLEASE TAKE NOTICE** that the above-captioned debtor and debtor-in-possession (the “Debtor”), through its undersigned proposed counsel, hereby files the *Proposed Consent Order Directing the Appointment of a Patient Care Ombudsman Pursuant to 11 U.S.C. § 333* attached hereto as Exhibit A.

Dated: New York, New York  
November 2, 2021

KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP

By: /s/ Tracy L. Klestadt

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**EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
In re : Chapter 11  
:   
HBL SNF, LLC, d/b/a, : (Subchapter V)  
EPIC REHABILITATION AND NURSING :   
AT WHITE PLAINS, : Case No. 21-22623 (SHL)  
Debtor. :   
----- X

**CONSENT ORDER DIRECTING THE APPOINTMENT  
OF A PATIENT CARE OMBUDSMAN PURSUANT TO 11 U.S.C. § 333**

WHEREAS, on November 1, 2021, HBL SNF, LLC, d/b/a Epic Rehabilitation and Nursing at White Plains (the “Debtor”), filed a voluntary petition commencing a case under Subchapter V of Chapter 11 of Title 11 of the United States Code and describing the Debtor as a Health Care Business as defined in 11 U.S.C. § 101(27A) (ECF No. 1); and

WHEREAS, the Debtor has consented to the entry of an order directing the United States Trustee to appoint a patient care ombudsman (“PCO”) in accordance with 11 U.S.C. § 333.

The Court has determined that the appointment of a PCO is necessary to monitor the quality of patient care and to represent the interests of the Debtor’s patients, and after due deliberation, it is hereby

ORDERED that the United States Trustee shall appoint a PCO pursuant to 11 U.S.C. § 333.

Dated: White Plains, New York  
November \_\_\_\_, 2021

\_\_\_\_\_  
HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

AGREED TO BY:

/s/ Tracy L. Klestadt  
Tracy L. Klestadt, Partner  
Klestadt Winters Jureller Southard & Stevens, LLP  
Proposed Counsel to the Debtor